

September 3, 2019 EPA Call with Powertech (Dewey Burdock UIC Permit Applicant)

Call commenced at 9:10 am

EPA: Douglas Minter, Valois Robinson, Rick Arnold, and Chuck Tinsley

Powertech: John Mays and Lisa Sheinost

EPA discussed the Class V Draft Permit conditions including minor/major changes in the following areas (Chuck Tinsley):

- Financial Responsibility Requirements
- Injection Well Construction Requirements
- Injection Zone Testing Requirements
- Geologic Coring Requirements for Confining and Injection Zone Analyses
- Water Quality Sampling Requirements for USDW Determination
- Madison Water Supply Well Requirements
- Seismic Activity Related Requirements
- Plugging and Abandonment Requirements

EPA discussed the Class III Draft Permit conditions including minor/major changes in the following areas (Valois Robinson and Rick Arnold):

- Post Restoration Monitoring (incl. Conceptual Site and Geochemical Modeling) Requirements
- Wellfield-specific Closure Plan Requirements
- Geochemical Stability Phase Monitoring Requirements
- Authorization to Inject Data Package Requirements for Wellfields 6, 7, and 8
- Excursion Monitoring Requirements for Injection and Non-Injection Zone Requirements
- Operational Monitoring Requirements for Domestic Water Well Sampling
- Injection Well Construction Requirements
- Injection Zone Testing Requirements
- Data requirements for the Conceptual Site Model and geochemical models
- Calibration Requirements for the Geochemical Models

EPA discussed the Draft Record of Decision for the Proposed Aquifer Exemption including minor/major changes in the following areas (Valois Robinson):

- Clarification of Aquifer Exemption Area Boundary Delineation
- Clarification of Need for Additional Capture Zone Analyses
- Options for Addressing Domestic Well 16 within the Proposed Aquifer Exemption Area

EPA discussed some of the Supporting Documentation for the Draft Permits including minor/major changes in the following areas:

- NHPA Compliance Documentation (incl. mitigation measures in Draft Permits)
- ESA Compliance Documentation (incl. mitigation measures in Draft Permits)
- Cumulative Effects Analysis
- Environmental Justice Analysis

John thought it would take at least two more weeks to review all of the permit-related documentation and determine if Powertech would have more questions, etc. to help inform their understanding of changes to the draft permits, etc. Douglas let John and Lisa know that at least 19 parties have requested a 90 day extension to the public comment period. John stated that 45 days would likely be enough to review and comment by October 10th.

Call ended at 10:50 am.